

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

RALPH JOHNSON,

Plaintiff,

v.

THE BOEING COMPANY, a Delaware  
corporation,

and

BARBARA WILEY, individually and on  
behalf of her marital community,

Defendants.

Case No. 2:17-cv-00706-RSL

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**AND  
PROPOSED ORDER**

**NOTING DATE: JUNE 13, 2017**

The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to extend the deadline for Defendants The Boeing Company ("Boeing") and Barbara Wiley ("Wiley") to file their respective Responses to Plaintiff's Complaint, which was filed on May 5, 2017 (Dkt. No. 1).

Plaintiff served Wiley with a copy of the Complaint on May 24, 2017. Plaintiff served Boeing with a copy of the Complaint on May 30, 2017. In the absence of an Order extending the deadline to respond to Plaintiff's Complaint, Defendant Wiley's response must be filed with the

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1 Court no later than June 14, 2017, and Defendant Boeing's response must be filed by no later  
2 than June 20, 2017.

3 The Parties now agree to extend both Defendants' time to answer, move, or otherwise  
4 respond to the Complaint to provide time for counsel to investigate the facts and the law in order  
5 to prepare an appropriate response to the complaint, and so that the Defendants Boeing and  
6 Wiley have the same deadline to respond. The parties therefore join in asking the Court to  
7 extend the deadline for Defendants to answer, move, or otherwise respond to the Complaint until  
8 Friday, June 30, 2017.

9 DATED on this 13<sup>th</sup> day of June, 2017

<p>11 LIFE POINT LAW</p> <p>12</p> <p>13 By: <u>s/ Gregory A. McBroom</u></p> <p>14 Gregory A. McBroom, WSBA #33133</p> <p>15 Bryan C. White, WSBA #52020</p> <p>16 LIFE POINT LAW</p> <p>17 31919 6th Ave. S, #A100</p> <p>18 Federal Way, WA 98003</p> <p>19 Phone: (253) 838-3454</p> <p>20 Email: <a href="mailto:McBroom@lifepointlaw.com">McBroom@lifepointlaw.com</a></p> <p>21 <a href="mailto:BWhite@lifepointlaw.com">BWhite@lifepointlaw.com</a></p> <p>22 <i>Attorneys for Plaintiff</i></p>	<p>FOX ROTHSCHILD LLP</p> <p>By <u>s/Laurence A. Shapero</u></p> <p>Laurence A. Shapero, WSBA #31301</p> <p>Fox Rothschild LLP</p> <p>1001 Fourth Avenue, #4500</p> <p>Seattle, WA 98154</p> <p>Phone: 206-624-3600</p> <p>Fax: 206-389-1708</p> <p>Email: <a href="mailto:lshapero@foxrothschild.com">lshapero@foxrothschild.com</a></p> <p><i>Attorneys for Defendants The Boeing Company and Barbara Wiley</i></p>
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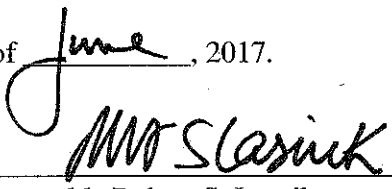
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**PROPOSED ORDER**

Pursuant to the stipulated motion of the parties as set forth above, IT IS HEREBY ORDERED that the parties' motion is GRANTED, and IT IS HEREBY ORDERED that the deadline for Defendants' to answer, move, or otherwise respond to Plaintiff's Complaint is extended to June 30, 2017.

IT IS SO ORDERED this 14<sup>th</sup> day of June, 2017.

  
\_\_\_\_\_  
Honorable Robert S. Lasnik  
United States District Court Judge

Presented By :

FOX ROTHSCHILD LLP

/s/Laurence A. Shapero  
Laurence A. Shapero, WSBA #31301  
Attorneys for Defendants

LIFE POINT LAW

/s/Gregory A. McBroom  
Gregory A. McBroom, WSBA #33133  
Attorneys for Plaintiff

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